

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
v.) Criminal No. 13-10048-FDS
)
)
KING BELIN)

JOINT STATUS REPORT

Pursuant to Local Rule 116.5(C), the parties are hereby jointly filing the following status report prepared in connection with the Interim Status Conference scheduled for June 25, 2013.

Disclosures Required under Local Rule 116.5 (b)(1)-(9)

1. Outstanding Discovery Issues

Automatic discovery was provided in this case by hand on 3/6/13. A supplement to that letter was sent out on 3/20/13 enclosing grand jury testimony. Defense counsel has indicated that a discovery letter will be filed tomorrow.

2. Additional Discovery to be produced

Other than discovery required under the local rules and supplemental expert disclosures and any additional discovery arising out of the most recent discovery letter, no party presently anticipates producing or requesting any other additional discovery.

3. Additional discovery requests

The government is advised that Belin will have a state court revocation hearing based on the underlying arrest. If that hearing takes place, the government will attempt to obtain the

testimony of any witnesses. The government will also rtespond to any discovery letter filed within 14 days.

4. Protective Orders

The parties do not presently anticipate the need for any protective order concerning any victim, witness, defendant or law enforcement sources or techniques.

5. Rule 12(b) Motions

The defendant intends to file a Motion to Suppress on or before August 15, 2013. The government asks that it be allowed to respond to the Motion on or before September 15, 2013.

6. Expert Disclosures

As set forth above, the parties have previously agreed that the government will make expert disclosures 21 days before trial and by the defendant no later than 7 days before trial.

7. Defenses

No defenses of insanity, public authority of alibi are anticipated.

8. Speedy Trial Act

The parties have conferred on the periods excludable from all Speedy Trial Act calculations and believe that the following periods are excludable since the defendant's arraignment on 3/16/13:

3/6/13-4/24/12	Excluded per Local rule 112.2(a)(1)
4/24/13-6/25/13	Excluded per order dated 5/7/13
6/26/13-Final Conf	Excluded at the request of the parties

Assuming that the latter request is granted, as of the Final

Status Conference, 0 days will have been counted and 70 days will remain under the Speedy Trial Act.

9. Anticipated Trial/Plea Discussions

Both parties believe that it will be impossible to determine whether the case will need to be tried pending briefing and resolution of the defendant's motion to suppress. Any trial is expected to last 5-7 days.

10. Final Status Conference

The parties are asking that the Final Status Conference be held during the week of August 19, 2013.

Respectfully submitted,

CARMEN M. ORTIZ
UNITED STATES ATTORNEY

By: /s/John A. Wortmann, Jr.
JOHN A. WORTMANN, JR.
Assistant U.S. Attorney
One Courthouse Way
Boston, MA
(617) 748-3207

/s/ Ian Gold
IAN GOLD
Federal Public Defender Office
51 Sleeper Street
5th Floor
Boston, MA 02210
617-223-8061
COUNSEL FOR KING BELIN

CERTIFICATE OF SERVICE

The government hereby certifies that the foregoing was this day filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing ("NEF") and paper copies will be sent to those indicated as non-registered participants.

/s John A. Wortmann, Jr. 6/24/13

JOHN A. WORTMANN, JR.

Assistant U.S. Attorney